

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
Climmie Y. Butler	§	CASE NO. 12-39574-H2-13
	§	
DEBTOR(S)	§	CHAPTER 13

**DEBTOR(S)' RESPONSE TO TRUSTEE'S MOTION TO DISMISS
AND REQUEST FOR HEARING**

At this time, Debtors have not provided a basis to oppose the Trustee's Motion to Dismiss filed on or about 4/29/2015 . However, Debtors' counsel request a hearing to protect Debtors' interest.

Respectfully submitted,

THE SUGHRUE LAW FIRM, PLLC

/s/ Jason D. Laas-Sughrue
Jason D. Laas-Sughrue
SBN: 24048150 / FBN: 602423
Mayur M. Patel
SBN: 24043863 / FBN: 573995
5225 Katy Freeway, Suite 505
Houston, TX 77007
Tel.: 713-228-0200 Fax: 713-588-8750
Attorneys for Debtor(s)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following parties, and on the attached list, if any, by first-class mail or by electronic service via the Court's ECF filing system on 05/19/2015:

Chapter 13 Trustee via Electronic Service
William E. Heitkamp
Chapter 13 Trustee
9821 Katy Freeway, Suite 590
Houston, TX 77024-1294

Debtor via First-Class Mail
Climmie Y. Butler
5014 Mabry Stream Court
Katy, TX 77449

/s/ Jason D. Laas-Sughrue
Jason D. Laas-Sughrue